

## Request for retroactive recognition of land

By submitting this application your operation seeks retroactive recognition of conversion period. Retroactive recognition for cultivated plots/ fallow/ virgin areas may be granted for the following organic Standards:

- Regulation (EU) 2018/848 (Art. 10.3(b) and Reg (EU) 2020/464, Art. 1)
- NOP (§ 205.400-406 National Organic Program)

Please fill in chapters 1-4 of this form and attach the mandatory annexes. The inspector will fill in chapter 5 during inspection (after the assessment of the request and submitted information by the certifier). If the risk analysis reveals a risk for a plot of being contaminated as a result of being treated with products and substances that are not authorised for use in organic production soil and/or plant samples need to be taken and analysed for each concerned plot. A decision about retroactive recognition may only be taken after on-site inspection of the plots has taken place. Processing of your application will be charged according to our price list.

Please note that verification of the application might take additional inspection and certification time as follows: all concerned plots have to be visited by the inspector, and in case of previously cultivated areas, respective records have to be cross-checked on-site. For Reg. (EU) 2018/848, in case of operations with products/ in countries requiring increased control measures by the EU (see [https://www.bio-inspecta.ch/docs/transfer/32\\_2402.pdf](https://www.bio-inspecta.ch/docs/transfer/32_2402.pdf)) a full check of the records for the period to be considered for retroactive recognition has to be done.

After evaluating the facts collected in this request form by the inspector, the final decision is taken by the certification committee.

Please attach all necessary documents according to chapter 4 of this form. Please keep documents and production records such as use of inputs, yield quantities, invoices, GMO free declarations, non-treatment declarations for seeds, or other information giving evidence of production during previous years ready for inspection.

### 1. Applicant/ Operator

Name of operator	
b.i Number	

## 2. Explanatory Statement

Please give reasons for requesting retroactive recognition for the plots listed in chapter 3.2.

Has the land ever been certified organic before?

If yes:

- by which certification body?
- according to which standard?
- from when to when?

If no:

- have the organic production rules according to the bi-OS standard/ NOP been applied?  
Self assessment:
  - how were weeds, pests and diseases managed during the last 3 years?
  - how was soil fertility managed during the last 3 years?
  - have you used treated seeds/ planting material during the last 3 years?

## 3. Field history of previous 3 years

### 3.1 Previous management

- Plots have been under the management of the applicant
- Plots have **not** been under the management of the applicant
- Name(s) and address(es) of former responsible(s) of the land:

Name	
Address	
Country	
Phone/E-mail	

**3.2: Details of plots for which retroactive recognition of conversion period is sought**

Year	Plot No. and/ or name	Area [ha]	Crop	Name/ variety of all used seeds/ planting material	Source/ manufacturer of seeds/ planting material	Name of all used in-puts (fertilisers, plant protection agents)	Source/ manufacturer of fertilisers/ plant protection agents
This year: 20							
Last year: 20							
Two years ago: 20							
Three years ago: 20							

**Note:** If there is not enough space, please add additional lines to list all plots.

**4. Annexes to be added by applicant:**

**Compulsory annexes:**

- Plot acquisition/ rental contract
- Google (or similar) map of plots, including geolocation
- Pictures of plots, with date of picture
- Harvest information of last 3 years
- Invoices and confirmation of untreated/ non-GMO seeds from suppliers for seeds used in the past 3 years
- Organic confirmation of used inputs (if available)
- In case of previous certification: Certificate and certified plot list of former certification body
- If plots have not been under management of the applicant: Written statement of land use and management practices of field(s) by former owner/ manager

**Other possible annexes:**

- Written statement of a competent and independent third party (e.g. authorities, NGO) confirming that the plots listed in chapter 3 have not been under cultivation /or that no prohibited inputs were applied over the past years.
- Pesticide analysis reports from accredited laboratories (please describe sampling place and method)
- other

**Please send the completed and signed form with annexes to: [international@bio-inspecta.ch](mailto:international@bio-inspecta.ch)**

**Confirmation by the operator that the above made declarations are correct and complete.**

Place/Date	Signature & Name	Stamp
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**Assessment of the request and attachment by bio.inspecta:**

**Request is accepted for onsite verification:**

<input type="checkbox"/> High risk of contamination <input type="checkbox"/> Medium risk of contamination <input type="checkbox"/> low risk of contamination <input type="checkbox"/> Soil or / and crop sample is required	<input type="checkbox"/> Reg. (EU) 2018/848 <input type="checkbox"/> NOP
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**Explanation:**

**Request is rejected for:**

	<input type="checkbox"/> Reg. (EU) 2018/848 <input type="checkbox"/> NOP
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**Explanation & justification:**

- Map with GPS coordination is not provided
- Request is incomplete
- No satisfactory evidences of using authorities seeds/input during last 3 years submitted
- other :

Place/Date	Signature & Name
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EU reply  
7i

**5. Onsite verification checklist(Inspector’s findings): *To be filled in by bio.inspecta inspector, this document is the manatory attachment of the production checklist (inspection report).***

EU reply 7i

***A description must be added whenever there is a text field!***

<b>Evaluation of the project region</b>	Yes	No
Is agriculture the primary source of livelihood for the farmers in the region?  The common farming practice is mainly: <input type="checkbox"/> intensive (high mechanization level, use of chemicals) <input type="checkbox"/> extensive (low mechanization level, use of chemicals is rarely found)  Listing of the typical crops grown in the region:	<input type="checkbox"/>	<input type="checkbox"/>
Are there official agriculture management measures conducted in the region (government/ state management and inspection etc.)? If yes, indicate dates of order and results of inspection and type of the suggested inputs:  Is there official chemical pest management/ requirements (government/ state) in the region for the type of production done by the operator? If yes, indicate common time and inputs:	<input type="checkbox"/>	<input type="checkbox"/>
Are chemical fertilizers, pesticides etc. easily available in the project area?  Do the farmers get support and free supply of pesticides from government or NGO’s?  How easy is the access to traders selling pesticides and seeds?	<input type="checkbox"/>	<input type="checkbox"/>
<b>Characteristic of the farm</b>	Yes	No
Has the operator good knowledge of organic farming practices?  Where did the operator get his knowledge from (training, consultant, self-study)?	<input type="checkbox"/>	<input type="checkbox"/>
Does the operator keep own animals?  Animal species and number of animals:  Animal manure shall not derive from factory farming. Was manure of the animals used on fields? If yes: Where did it come from?	<input type="checkbox"/>	<input type="checkbox"/>
If plots have not been under management of the applicant:	<input type="checkbox"/>	<input type="checkbox"/>

Written statement of land use and records about management practices (ref. paragraph "documentation") by former owner/ manager have been checked and are attached:	<input type="checkbox"/>	<input type="checkbox"/>
Interview with the former owner/ manager has been done:	<input type="checkbox"/>	<input type="checkbox"/>
Is there plausible proof that the former owner/ manager did not use any prohibited inputs (e.g. treated or GMO seeds, fertilizers, plant protection agents)?	<input type="checkbox"/>	<input type="checkbox"/>
Land purchase contracts/ land rental contracts have been checked. If there is no purchase/ rental contracts/ other evidence, but the operator claims that the plots have been under their management in previous years, there must be a confirmation about this by the land owner, including evidence (e.g. contract between the owner and manager, organigram, etc.).	<input type="checkbox"/>	<input type="checkbox"/>
<b>Documentation of previous cultivation</b>	<b>Yes</b>	<b>NO</b>
Production records, purchase invoices, yield records or other documents regarding the farm management, use of any (allowed and/ or prohibited) inputs, planting materials for the last 3 years (name of input, applied quantity, date of application, purchase invoices) have been cross-checked (fully checked for high risk countries and high risk products). Please describe what records have been checked and what are the findings (list all kind of available documents and records, and add for which year they are available; upload to the Intact Platform examples of documents from all years):	<input type="checkbox"/>	<input type="checkbox"/>
Are yields plausible for the cultivation practices declared (include information about usual yield for the crop in the region, comparing it with the announced cultivation practices)?	<input type="checkbox"/>	<input type="checkbox"/>
If yield data before starting organic practices are available, was there a decline in yield when organic practices started?	<input type="checkbox"/>	<input type="checkbox"/>
<b>Farm visits</b>	<b>Yes</b>	<b>No</b>
Have any prohibited inputs been found on the farm (storage, fields, etc.)? If yes, please mention name, active substance, manufacturer, add pictures and explanation of operator:	<input type="checkbox"/>	<input type="checkbox"/>
Do spraying equipment/ fertilizer application machines/ tools show any hints that chemicals have been used (by smell, appearance, rests etc.)? If yes, please describe and attach pictures.	<input type="checkbox"/>	<input type="checkbox"/>
Have all plots proposed for retroactive recognition (single/ICS) been physically visited?	<input type="checkbox"/>	<input type="checkbox"/>

<p><b>A photo of each plot visited must be attached (indicate the plot number photo wise (relevant only for single operators)).</b></p>	<input type="checkbox"/>	<input type="checkbox"/>
<p>If no, indicate here which plots could not be visited and name the reason (unvisited plots can not be granted retroactive recognition):</p>	<input type="checkbox"/>	<input type="checkbox"/>
<p>Is there evidence that the declared crops have been grown in the previous year (e.g. stubbles, grains).</p>	<input type="checkbox"/>	<input type="checkbox"/>
<p>Is there evidence that the agricultural measures declared in chapters 2 and 3 have been implemented? Please include your plausibility considerations (e.g. dryland farming, irrigated farming; income fetched by the culture, incentives for applying/ not applying unallowed inputs, etc.).</p>	<input type="checkbox"/>	<input type="checkbox"/>
<p>In case of "organic by neglect", is there evidence for the neglect? Please include your plausibility considerations (e.g. describe the vegetation in the plot and compare with typical vegetation for the region; describe whether e.g neglected orchards are usual in the region; no profitable cultivation possible in past years, now the market situation changed; incentives for applying/ not applying unallowed inputs; etc.).</p>	<input type="checkbox"/>	<input type="checkbox"/>
<p>In case of fallow/ virgin land, is there evidence in the vegetation of the plot that it was fallow/ virgin for the period declared? Please include your plausibility considerations (e.g. describe the vegetation in the plot and compare it with typical vegetation for the region and, in case of fallow land, considering the time period for which the plot is claimed to have been fallow, etc.).</p>	<input type="checkbox"/>	<input type="checkbox"/>
<p>For groups with internal control system (ICS)</p>	<input type="checkbox"/>	<input type="checkbox"/>
<p>Is there a system describing the procedure for retroactive recognition in the ICS?</p>	<input type="checkbox"/>	<input type="checkbox"/>
<p>Does the procedure described in the ICS meet the requirements to submit satisfactory proof for no use of unallowed input in the past 3 years in plots for which ones retroactive recognition is required?</p>	<input type="checkbox"/>	<input type="checkbox"/>
<p>Is there documentary evidence in the farm files of the information collected for each farm about the plot history?</p>	<input type="checkbox"/>	<input type="checkbox"/>
<p>Are the plots (all proposed farmers/ plots) physically visited by the internal inspectors and are the visits documented in internal inspection reports? If no, indicate here which farmers/ plots and the reasons:</p>	<input type="checkbox"/>	<input type="checkbox"/>
<p>Are the ICS decisions for proposed farmers/ plots matching with existing information and findings of internal inspections?</p>	<input type="checkbox"/>	<input type="checkbox"/>

Does the information obtained during external farm visits match with the information of the ICS?	<input type="checkbox"/>	<input type="checkbox"/>
In case of doubts, the following actions were taken to ensure compliance: <ul style="list-style-type: none"><li>- Interview with seed/ chemical shops in the region (do they know the farmer? Did they sell chemicals to him?)</li><li>- Interview with neighbours (what farming practices could be observed during the last 3 years?)</li><li>- Interview with village leader (what farming practices could be observed during the last 3 years?)</li></ul> The interview(s) led to the following conclusion:	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
Based on the above risk assessment, for each plot where there is a risk of being contaminated as a result of being treated with products and substances that are not authorised for use in organic production, a soil and/or crop sample is taken (sampling protocol is attached and.  Comments	<input type="checkbox"/>	<input type="checkbox"/>

**Confirmation inspector:**.....  
Place/ Date of inspection.....  
Signature & Name